

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

CLARENCE ABELDGAARD,)

OCEAN VIEW ENTERPRISES, INC.,)

CLOYD MOSER, MODEB)

INVESTMENTS AND GERALDINE)

BARLING,)

Defendants.)

Case No. A01-378 CI (RRB)

**NON-OPPOSED MOTION FOR
ADDITIONAL TIME TO FILE
ANSWER TO COMPLAINT
AND STATUS REPORT**

COMES NOW, Geraldine Barling, by and through her undersigned counsel, Darryl L. Thompson, Esq. of the Law Office of Darryl L. Thompson, P.C., and hereby respectfully submits this non-opposed motion for additional time to file an answer in the above captioned case.

Ms. Barling requests an additional thirty days, until March 3, 2006, to file an answer to the second amended complaint. The United States does not oppose this request.

All counsel are attempting to resolve this case short of filing an answer. Since the last request for an extension, counsel for the United States has provided to undersigned counsel relevant background information as well as specific and detailed settlement information. Counsel for Ms. Barling and for

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the United States also have discussed that information in some detail.

Prior to the requested due date of March 3, 2006, undersigned counsel anticipates making a good-faith settlement proposal. To do so, undersigned counsel will need to obtain an initial cost estimate for the proposed restoration/mitigation work and contact third party owners of some of the affected parcels of land to determine whether those parcels could be purchased and conveyed with conservation easements as part of a settlement.

Given the amount of time and work involved in moving forward with the settlement efforts, it is the undersigned's desire to extend the time necessary to file an answer for an additional 30 days. Given the limitation of resources, it is felt that it is a better use of attorney time at this juncture to act on the settlement items, rather than spend the extensive amount of time required to file an answer.

For the above reasons, the additional time to file an answer is hereby requested.

DATED this 1st day of February 2006.

DARRYL L. THOMPSON, P.C.

By: e/signed
Darryl Thompson
ABA No. 8706055

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The undersigned certifies that a true
and exact copy of this foregoing document,
has been mailed to:

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DATED this 1st day of February, 2006.

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By: e/signed
Michelle Webb
Legal Secretary

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